

My name is Scott Thomas and I am over the age of nineteen years.

I am currently the Director of Internet Services for the law firm of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. and held this position since February 7, 2007. Before receiving this position, I was Director of Technology, for the law firm of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. I have held this position since October 2005. Prior to that time, I was the Lead Web Designer of Beasley, Allen, Crow, Methvin, Portis and Miles, P.C. and was hired for that position in May of 2004.

I have had 24 years of on-hand experience in the computer field. I received formal computer training at Louisiana State University, Auburn University and Trenholm State Technical College.

I am familiar and experienced with all Windows Operating Systems, including the following:

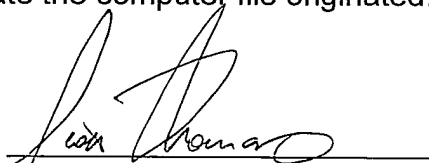
1. MS-DOS;
2. Windows 1.0-3.11;
3. Windows 95-98;
4. Windows ME;
5. Windows XP;
6. Windows NT – NT Workstation;
7. Windows 2000; and
8. Winders Server 2003.

Back in September of 2006, I assisted Michael Crow in drafting certain discovery requests attached to the Motion to Compel as Exhibit 1 or *Plaintiff's*

Seventh Request for Production. Based upon the information he was attempting to seek.

I have reviewed *Plaintiff's Seventh Request for Production* and in my opinion the indexes sought are very easily obtainable. Attached to my *Affidavit* is Beasley, Allen, Crow, Methvin, Portis and Miles, P.C's S.O.P. IT-2010, which set out the steps required to obtain the computer file indexes sought by the request.

I have reviewed the previous computer indexes produced by Defendant's, which indicated the last date the computer file was modified. The person who obtained these indexes could have clicked the computer mouse one additional time to obtain a computer index showing the date the computer file originated.


SCOTT THOMAS

Sworn to and Subscribed before me on this the 28th day of February, 2007.


NOTARY PUBLIC

MY COMMISSION EXPIRES JUNE 16, 2010

Last Modified by: Scott Thomas

2/22/2007

S.O.P. IT-2010**Information Technology Standard Operating Procedure****Create an index of files using the print screen key**

Purpose: The purpose of this operating procedure is to outline the procedure for creating an index of computer files using the Print Screen Key.

Background: The Windows **Print Screen** Key can be a powerful tool if you know how to use it to its full potential. The key may appear differently depending on the manufacturer of your Windows keyboard. The standard position would be at the upper right hand corner of your keyboard and may appear within this sequence of keys:

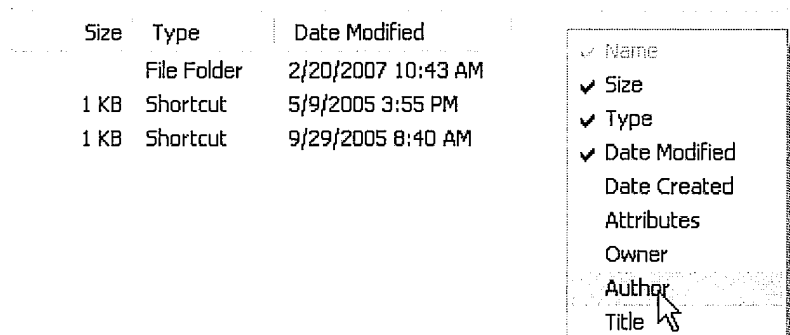


The sole function of this key is to take a snapshot or picture of your computer screen and copy it to the clipboard (the clipboard is an invisible holding area for content that is copied).

* The procedure may vary slightly depending on operating system.

Procedure:

1. Right-click the Start button and select **Explore**.
2. Press **Ctrl + F** to bring up the search tool.
3. Click **All files and folders** then chose **More advanced options**.
4. Fill in the appropriate search criteria and click **Search**.
 - a. To search for all Microsoft Word and Adobe PDF files (for example) modified within a particular date range (1) enter ***.doc, *.pdf** in the *All or part of the file name* input box, (2) choose the appropriate drive (local or network) in the *Look in* drop-down box, (3) choose the appropriate date range under *Where was it modified?*
 - b. To ensure that your search is accurate make sure to select (1) **Search system folders**, (2) **Search hidden files** and folders and (3) **Search subfolders**.
5. If the Date Created and Author columns are not visible, right-click the File Attributes bar and select Date Created and Author options.



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6. Press the **Print Screen** Key.
7. Press **Ctrl + V**. This will paste a screen shot into the document of your choice (Word, Outlook, etc.) at the position of your cursor.

Approved by: /s/ Scott Thomas Date: 1/20/2006

Title: Director of Technology

Signed: _____